

Exhibit CCC

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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SIRI DIAZ, CAROLYN SIEGEL, TALIA BUMB, BLERTA
VIKKI, DANIELLE OWIMRIN, on behalf of themselves
and others similarly situated,

Plaintiffs,

-against-

SCORES HOLDING COMPANY, INC.; GO WEST
ENTERTAINMENT, INC. a/k/a SCORES WEST SIDE, and
SCORES ENTERTAINMENT, INC., a/k/a SCORES EAST
SIDE

Defendants.

CIVIL ACTION NO.: 07 Civ. 8718(RMB)

-----X

200 Park Avenue
New York, New York

January 28, 2008
10:10 a.m.

DEPOSITION of BLERTA VIKKI, one of
the Plaintiffs herein, pursuant to Notice,
before Ronald A. Marx, a Notary Public of the
State of New York.

ELLEN GRAUER COURT REPORTING CO. LLC
126 East 56th Street, Fifth Floor
New York, New York 10022
212-750-6434
REF: 86582

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1 A P P E A R A N C E S:

2

3 OUTTEN & GOLDEN LLP

4 Attorneys for Plaintiff

5 3 Park Avenue

6 New York, New York 10016

7 BY: CARA E. GREENE, ESQ.

8 PHONE 212.245-1000

9 FAX 212.977.4005

10 E-MAIL ceg@outtengolden.com

11

12

13 GREENBERG TRAUIG, LLP

14 Attorneys for Defendant

15 Met Life Building

16 200 Park Avenue

17 New York, New York 10166

18 BY: NEIL A. CAPOBIANCO, ESQ.

19 PHONE 212.801.9302

20 FAX 212.805.5501

21 E-MAIL capobiancon@gtlaw.com

22

23

24

25

1 VIKKI

2 A I mean, everything you mean by that,
3 like uniforms and --

4 Q Tell me what she told you to the best
5 of your recollection.

6 A Oh. When I start to work, you know,
7 they hired me, you know, she sit in the dressing
8 room.

9 And she was saying you have to work
10 five nights a week. You have to be two
11 nights -- I mean, two -- you know, two of
12 those -- you have to work two weeks Sundays.
13 You know, two Sundays in a month, you know, you
14 have to be -- any of those.

15 She said your shift is going to be
16 6:30 to three. And you have to wear those kind
17 of dresses.

18 They had the dresses in the dressing
19 room. They sell those dresses in the dressing
20 room.

21 You have to wear the high heels, like
22 regular high heels. You have -- you also --
23 like specific -- you know, you had -- we had to
24 buy underwear that they sell through the club.
25 And that's...

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1 VIKKI

2 Q Anything else?

3 A That's it.

4 Q Now, this is something Lisa told you
5 when you came to the club and you were getting
6 ready to go out on to the floor?

7 A I didn't work that night. I got
8 hired that night, and I said I'm going to come
9 the next day.

10 And she was saying, "I better go over
11 with you tonight, and when you come the next
12 day, you know -- you know, I explain to you all
13 about the club what you should do and stuff."

14 Q Okay. Now, before -- so you said you
15 started, you think, about February, March of
16 2004 at the Scores East Club?

17 A No. West Club.

18 Q You started at the West Club?

19 A Yes.

20 Q So this discussion you had with
21 Robert was at the West Club?

22 A Yes.

23 Q I'm sorry.

24 A They just opened up the west side.

25 It was probably a month when they open up, and I

1 VIKKI

2 just started there, and they got the managers in
3 the east side that was working in the west side
4 to get us started.

5 Q Okay. So the discussion you had with
6 Robert and Lisa was in connection with you
7 working at the Scores West Club?

8 A Yes.

9 Q And you said that was in February or
10 March 2004?

11 A That's correct.

12 Q Okay. Now, prior to working at
13 Scores West in February, March of 2004, where
14 did you work prior to that?

15 A I was working as waiters.

16 Q You were working --

17 A A waitress. Not at Scores. You mean
18 where I used to work before I started Scores?

19 Q Well, I -- that's what I was trying
20 to understand.

21 You first started working at the west
22 side club in February, March of 2004. Is that
23 your first employment by Scores?

24 A Yes.

25 Q Okay. And where were you working

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1 VIKKI

2 prior to that?

3 A What do you mean, prior to that?

4 Q Before.

5 A Before? I used to work in the -- I

6 mean, a restaurant waitress.

7 Q What restaurant was that?

8 A Marathon. Marathon Grill.

9 Q Marathon Grill?

10 A Yes.

11 Q Where is that?

12 A In Philadelphia.

13 Q And you were a waitress there?

14 A Yes. Waitress and host -- hostess.

15 Q Hostess?

16 A Yes.

17 Q And you were -- and that was in

18 Philadelphia?

19 A Yes.

20 Q When did you do that job?

21 A When? I work there about two years.

22 Q And how were you paid as a waitress,

23 as a hostess?

24 A How? I was working on tips. More --

25 I was paid 2 or \$3 an hour. I don't remember

1 VIKKI

2 exact, you know. And on tips, you know.

3 Q Plus tips?

4 A Yes.

5 Q Were you paid the same way as a
6 waitress and as hostess?

7 A Yes, because I was getting tips as
8 the hostess.

9 Q And prior to working at Marathon
10 Grill, where did you work?

11 A Nowhere.

12 Q Nowhere?

13 A Yes. Just came in this country.

14 Was --

15 Q Where did you come from?

16 A Albania.

17 Q From Albania?

18 A Yes.

19 Q Did you work in Albania?

20 A No. I was in school there.

21 Q So your first job upon coming to the
22 U.S. was at Marathon Grill?

23 A Yes.

24 Q And then your next job was at Scores?

25 A Correct.

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1 VIKKI

2 Q Now, did you ever work -- you said
3 you worked at the west side club. Did you ever
4 work at the east side club?

5 A Yes.

6 Q When did you do that?

7 A After nine months I work in the west
8 side I worked in the east side.

9 Q But you started on the west side?

10 A Yes.

11 Q Now, when you started on the east
12 side, did anybody speak to you about what your
13 job would be on the east side?

14 A They speak with me, the house mom,
15 but it was the same rules.

16 Q Well, who was the house mom?

17 A The same house mom.

18 Q So they were the same house moms on
19 the east and the west side?

20 A Yes, because the west side got
21 already house moms, you know. They just open
22 up, and then they shared stuff until the west
23 side would get enough staff -- you know, staff
24 to work.

25 Q So did Lisa or Gina -- was there a

1 VIKKI

2 manager on the east side at that time?

3 A It was the same manager, Robert. In
4 the east side is the same manager, but he moves
5 back and forth. He goes to west and east side.

6 That time he was on east side until
7 the west side could get -- you know. I don't
8 know. I was working there at that time.

9 Q Did you have to apply for a position
10 on the east side?

11 A No. I just switched. He said I
12 didn't have to apply. If I was working Scores,
13 you can work any Scores.

14 Q Did anyone request that you move to
15 the east side?

16 A No.

17 Q Did you decide you wanted to move to
18 the --

19 A Yes. I asked the manager. He said
20 okay, no problem.

21 Q You asked the manager if you could
22 work on the east side?

23 A Yes. I asked Robert. I said, "I
24 want to work here." He said, "That's fine. I'm
25 going to talk to the managers on the west side."

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1 VIKKI

2 Q Did you work at any other club
3 besides Scores West and Scores East?

4 A I worked for a week in Florida
5 because they send us, Miami. I don't know the
6 address, but they paid for us to go there when
7 they opened the club.

8 Q So where in Miami did you work?

9 A It was a Scores in Miami. I don't
10 know what it was address, but I remember it was
11 Biscayne -- Biscayne Boulevard.

12 I don't know -- they paid for us.
13 They paid everything. They sent about 10, 15
14 girls.

15 Q Did you work anywhere else other than
16 those three locations you just identified?

17 A No.

18 Q How did you learn to be a dancer?

19 A What you mean? Clarify the question,
20 please?

21 Q Well, did you consider yourself a
22 dancer when you worked at the club?

23 A Not really, no.

24 Q What did you consider yourself to be?

25 A I was going to school, and I was

1 VIKKI

2 A Yes. It's not a matter about color.

3 Q Did it look like your underwear?

4 A No.

5 Q Could you wear that underwear you got
6 from Scores elsewhere?

7 A Not comfortable, but like personally
8 to me, no. But I don't know if somebody else.
9 I couldn't wear it.

10 Q But could you wear it?

11 A I was not -- I don't know, like
12 comfortable. I don't know what I should say.
13 Just not for --

14 Q You're saying you didn't find that
15 underwear comfortable?

16 A Yes. I mean, I had to wear those to
17 work over there. I had -- I didn't have any
18 other choice, but outside there I would not wear
19 it.

20 Q Aside from the underwear, what else?
21 What -- was there anything else you needed to
22 put on in the dressing room?

23 MS. GREENE: Objection. Are
24 you still referring to the first
25 audition or just in general?

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1 VIKKI

2 Q Well, let's talk about the first
3 audition.

4 A What do you mean, first audition?

5 Q The audition you had at Scores West.

6 A It's the same.

7 Q First time.

8 A Yes. It's the same thing with the
9 east side. Was same uniform. It's the same.

10 Q But let me ask you this. You talked
11 about the dress.

12 A Yes.

13 Q You talked about the high heels. You
14 talked about the underwear.

15 A Yes.

16 Q Was there anything else you needed to
17 wear for your audition?

18 A No. That's it.

19 Q Okay. Now you -- and then you said
20 you came down the stairs?

21 A Yes.

22 Q And you --

23 A The house mom.

24 Q And you went on the stage?

25 A Yes.

1 VIKKI

2 Q Okay. And you danced?

3 A Yes.

4 Q Did you know how to dance when you
5 got there?

6 A I didn't know. I -- you know,
7 whatever -- how I know, I danced. You know,
8 maybe -- whatever like. Whatever.

9 You know, like I danced like
10 normally. Maybe I didn't know how to dance like
11 a dancer or entertainment, no. I didn't know
12 how to dance.

13 Q Were you dancing by yourself?

14 A Yes.

15 Q And how long did you dance for?

16 A With for one song.

17 Q One song?

18 A Yes.

19 Q Did you select the song?

20 A No.

21 Q Did anyone show you how to dance?

22 A No. I'm sorry. The house mom was
23 saying -- I was asking her. I was nervous. I
24 said what I should do. She said just go. Just
25 go around the stage and to the pole, and that's

1 VIKKI

2 A No, because the customers always tip
3 me by credit card to the -- you know, and I
4 never got that money. They never give it to me.

5 You know, not me, but to all the
6 girls, you know. And I never asked. But he was
7 saying, "I left your tip," and if I would say,
8 you know, to the customers I don't get the tip,
9 you know, I would get a large trouble.

10 If I was asking, you know, if he tip
11 with credit card where's my tip, I get in
12 trouble, like forget it. And always -- I
13 never -- I never asked them.

14 Q Okay. Let me go to the issue of the
15 house fee.

16 Was the house fee always the same
17 amount of money?

18 A It was 180.

19 Q Always 180?

20 A Saturdays was, I believe, 160 or 140.
21 I don't remember. Because I --

22 Q Saturdays was less?

23 A Yes -- no. Sundays. I'm sorry.

24 Sundays was something -- I don't remember. It's
25 been awhile for me I didn't work over there, and

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1 VIKKI

2 it's changed, you know.

3 Q Let me ask you this. Was the house
4 fee always the same amount of money?

5 A I mean, six days a week was -- no.

6 I'm sorry. Mondays was 160. And rest of the
7 days and Sunday was same thing.

8 Monday or Sundays was probably 140,
9 160. Sometimes was -- Sunday was a little busy.
10 I couldn't afford it.

11 I will pay probably \$80, because -- I
12 mean, I couldn't, you know. I'm going minus,
13 only I had to work those days. I was...

14 Q When did you pay the house fee?

15 A To the house mom.

16 Q When though?

17 A When? End of the night.

18 Q The end of the night you paid the
19 house fee?

20 A Yes. I couldn't leave if I was not
21 paying the house fee. I had to pay.

22 Q Could you pay the house fee in funny
23 money?

24 A Yes.

25 Q Did you typically pay it with funny

1 VIKKI

2 money?

3 A Half and half. Whatever, you know.

4 Sometimes, you know, I didn't have funny money

5 and will pay cash, and I would go home with

6 zero. Depends on the night.

7 Or maybe I cashed funny money and I

8 think maybe I'm going to take -- I'm going to

9 make funny money later.

10 I never did it. Was never busy, and

11 I had to pay with my money, the money I made the

12 night before.

13 Q So you could end up with less money

14 than you started with?

15 A Oh, yeah. Of course.

16 Q So you could actually loose money by

17 working a whole shift?

18 A Not one time. Some of the times.

19 Q Excuse me?

20 A It's -- yes. So many times that

21 happened.

22 Q That happened several times?

23 A Yes. Like sometimes -- I mean, I

24 will go to the manager. I will say I can't -- I

25 can't pay. I'm not going to pay 180.

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1 VIKKI

2 You know, pay 80 or 90, a hundred or
3 60, you know, because I couldn't afford it. I
4 had to pay DJ and I had to pay house mom and
5 makeup artist. I couldn't afford it.

6 Q So you could negotiate a lower house
7 fee if it was slow?

8 A Maybe two or three times.

9 Q Who did you negotiate that with?

10 A Not negotiate. I will ask, you know,
11 and if I didn't -- if -- I mean, I will say to
12 the managers, general manager.

13 Q So Robert?

14 A Robert. I would say, "Robert, I
15 didn't make money." Like that happens for two
16 weeks in a row.

17 You couldn't help me because he --
18 you -- maybe he would like to help me, but
19 somebody -- I mean, they'll come and you need.

20 Q Now, was Robert always the manager
21 the whole time you worked for Scores?

22 A Yes.

23 MS. GREENE: Can we just take a
24 short restroom break?

25 MR. CAPOBIANCO: Sure.

1 VIKKI

2 (Recess taken).

3 CONTINUED DIRECT EXAMINATION BY MR. CAPOBIANCO:

4 Q Now, Ms. Vikki, did you file for
5 unemployment when you left Scores East?

6 A No.

7 Q Now, did you bring any documents with
8 you today here?

9 A What kind of documents?

10 Q Did you bring any documents?

11 A No.

12 Q Did you have any documents from your
13 work at Scores that you gave to your attorney
14 previous to today?

15 A I don't understand the question.

16 Q Well, did you -- did you have any --
17 for example, any 1099 tax forms?

18 A Yes.

19 Q Did you give those to your attorney?

20 A Yes. I don't remember. I don't
21 remember. I don't know. I don't remember. I
22 don't remember.

23 Q Now, when you stopped working for
24 Scores East, did you have any documents at home
25 that you had received from Scores?

1 VIKKI

2 Q So the DJ also would sign the receipt
3 book?

4 A Yes.

5 Q Okay. And you would put down how
6 much you paid the DJ?

7 A Correct.

8 Q And what would you write down for
9 the --

10 A DJ I write down.

11 Q Just DJ?

12 A Yes.

13 Q Is there anyone else you had sign
14 your receipt book besides the house mom and the
15 DJ?

16 A The makeup artist, the house mom tip.

17 Q Let's start with the makeup artist.

18 A Yes.

19 Q Who was the makeup artist?

20 A It's Kasha or Jennifer.

21 Q Kasha?

22 A Yes. Or Jennifer.

23 Q Is this at Scores East?

24 A Yes.

25 Q And what did Kasha or Jennifer do for

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1 VIKKI

2 you?

3 A Jennifer and Kasha, they makeup
4 artist. They will do my makeup.

5 Q So when you arrived at the club, you
6 didn't have any makeup on?

7 A No. I would do makeup over there.

8 Q You did it at the club?

9 A Yes.

10 Q You did it yourself or they did it
11 for you?

12 A If I would do it myself, I could do
13 it. I could use makeup or my makeup. You know,
14 they would help me if I didn't have something,
15 and if I was just not feeling to do the makeup
16 they do it for me, and I would pay them.

17 Q But could you decide to do your
18 makeup on your own?

19 A Yes.

20 Q And not pay the makeup artist?

21 A Yes. But you to tip them anyway.

22 Q You had to tip them whether you used
23 them or not?

24 A Yes. If I was doing my own makeup,
25 you have to tip them \$20. And if they going to

1 VIKKI

2 do that for me I would tip them -- it was 40

3 makeup.

4 Q Now, who is it -- who -- did anyone
5 ever tell you that you had to tip them --

6 A Yes.

7 Q -- whether or not you used them?

8 A Yes. First day I start, that's what
9 I explained to tip. You know, they saying tip
10 the makeup artist. You have to tip the DJ. You
11 have to tip the house mom. You have to tip
12 each.

13 Q So you had to pay the house fee to
14 the house mom, and you had to pay the house mom
15 a tip?

16 A Yes.

17 Q And how much tip did you give the
18 house mom?

19 A It was mandatory \$5, but I had always
20 to give it to her \$20, because --

21 Q It was mandatory \$5?

22 A \$5. But, you know, she would do a
23 lot of stuff, you know, for us, and I would give
24 her 20.

25 She was nice. If I need something,

1 VIKKI

2 A Yes.

3 Q Now, did you ever tip the DJ to play
4 certain music that you wanted played?

5 A Sometimes, yes. Because he was
6 saying, "I don't have that song," you know. He
7 will play that kind of trick, and I would say,
8 "All right. I'm going to tip you at the end.
9 I'll give you \$20."

10 Q And then he would have the music?

11 A Yes.

12 Q Or did you bring your own music?

13 A No. I never bring my own music. He
14 had, you know.

15 MR. CAPOBIANCO: I'd like to
16 have this marked as Vikki Exhibit 1.

17 (Vikki Exhibit 1, application,
18 was marked for identification, as of
19 this date.)

20 Q Now, Ms. Vikki, when you first went
21 to Scores to apply for the job, did you fill out
22 any paperwork at that time?

23 A I don't remember. I remember on east
24 side, but I don't remember.

25 Q Now, this document that we marked as

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1 VIKKI

2 Vikki Exhibit 1, is this in your handwriting?

3 A This one, yes.

4 Q Yes. And this address here, 928 59th
5 Street, was that one of your addresses?

6 A Yes. It's one of -- I used to live
7 with my aunt a long time. I just see I
8 remember. Since when I moved to New York, the
9 first address I had.

10 Q So this was the address you had when
11 you first moved to New York?

12 A Yes.

13 Q Okay.

14 A I'm sorry. I didn't -- I didn't
15 remember this address. It's been awhile.

16 Q How long did you live at that
17 address?

18 A About a month.

19 Q One month. So do you think -- was
20 this the application you filled out when you
21 first started?

22 A Because I put this address, because
23 my aunt were not moving anywhere. That's why I
24 put the address.

25 You know, it was like anything I

1 VIKKI

2 was -- for taxes, like 1099, this address was
3 changing.

4 I would move, you know, get a
5 roommate. I will be at a different address.

6 You know, that's why I put her address down.

7 Q I see. So when you first came to New
8 York, you lived with your aunt for a month, and
9 she lived at 928 59th Street --

10 A Correct.

11 Q -- Apartment 6?

12 A That's right.

13 Q And where did you move after that?

14 A I moved -- I moved two or three -- I
15 move to 6412, but before that I moved to 6 -- I
16 don't remember.

17 I moved for couple of months. Six
18 months I moved in Dyker Heights. I don't
19 remember the address.

20 Q Hold on for a second. Let's start
21 with the beginning. You lived with your aunt
22 for a month?

23 A Yes.

24 Q And then you moved to another place?

25 A Yes.

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1 VIKKI

2 Q Did you live alone? Were you living
3 with someone else?

4 A With my friend.

5 Q With your friend. Which friend was
6 this?

7 A Friend. I shared the rent.

8 Q What's her name?

9 A What's her name? What's her name? I
10 don't remember. It's been...

11 Q Well, here on the next page you list
12 a friend, Elda. Was this Elda?

13 A Elda, no. It's not that one. It's
14 different friend.

15 Q Okay. So how long did you live at
16 the place you lived at right after you lived
17 with your aunt?

18 A About four months.

19 Q Four months?

20 A And then I moved.

21 Q And do you remember where that was?

22 A Where? In Dyker Heights. Was 77th
23 Street. I believe was between 9th and 10th
24 Avenue, but I don't remember.

25 Q Dyker Heights?

1 VIKKI

2 A Yes. Brooklyn.

3 Q That's a neighborhood?

4 A Yes. I don't remember exact.

5 Q So you lived there about four months?

6 A Yes.

7 Q This is where you moved after you
8 lived with your aunt?

9 A Yes.

10 Q And then after you lived with your
11 friend for four months in Dyker Heights, where
12 did you move?

13 A I moved to 6412.

14 Q Okay.

15 A 20th Avenue.

16 Q 20th Avenue. And did you live there
17 by yourself?

18 A Yes.

19 Q And how long did you live there?

20 A About -- approximately a year.

21 Q One year?

22 A Yes.

23 Q And then where did you move?

24 A I moved to 70th Street. 2025 70th --
25 I moved there for about couple of months. I

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1 VIKKI

2 don't remember exact.

3 Q Couple of months?

4 A Yes. Could be, you know, until I
5 moved with my husband.

6 Q So where did you live -- how long did
7 you live -- you said you were there only a
8 couple of months at 70th Street?

9 A Could be four months or three months.
10 I don't remember.

11 Q Were you living by yourself there?

12 A I was living -- no. With cousin
13 could be. Related to me.

14 Q You were living with a cousin?

15 A Yes.

16 Q Did you move into his or her house?

17 A To her house.

18 Q You moved into her house?

19 A Yes.

20 Q And then where did you move?

21 A I moved -- and then Bay Ridge with my
22 fiance.

23 Q Okay.

24 A My house now.

25 Q What is his name?

1 VIKKI

2 A Kurt.

3 Q Kurt. Did you meet him at the club?

4 A No.

5 Q And what's that address?

6 A Where I used to live?

7 Q With Kurt. Where you moved after you
8 lived with your cousin.

9 A I moved to 1-74th Street.

10 Q One-74 --

11 A Street, Apartment 1N. 1N. Brooklyn,
12 New York 11 -- I do not remember the zip code.

13 Q Okay. And what -- how long did you
14 live there?

15 A I lived there seven months. Yes.

16 Seven.

17 Q Seven months?

18 A Six, seven months I lived there.

19 Q Okay. And where did you move after
20 that?

21 A 3821 Laurel Avenue. We bought a
22 house.

23 Q 30 --

24 A 3821 Laurel Avenue.

25 Q Laurel?

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1 VIKKI

2 A Yes.

3 Q Okay.

4 A Brooklyn, New York 11224.

5 Q How long did you live there?

6 A We been living there since we bought
7 a house. It's our house.

8 Q When did you buy it?

9 A Last year and -- yes. Last year, in
10 October 30th or 29th.

11 Q Of '07 or '06?

12 A '06. I'm sorry. '06. It -- it's
13 been a year and 14 months we moved there.

14 Q So now prior to living with your aunt
15 for that month, where did you live?

16 A I don't understand.

17 Q You said you lived with your aunt at
18 928 59th Street?

19 A Yes.

20 Q Where did you live prior to that?

21 A Philadelphia.

22 Q Okay. And when you were in
23 Philadelphia, did you do any dancing there?

24 A Not at all.

25 Q Not what?

1 VIKKI

2 A No.

3 Q Did you say not really?

4 A Not at all, I said.

5 Q Oh. Not at all. Okay. I didn't
6 understand what you said.

7 A I'm sorry.

8 Q Okay. Now, looking at Vikki
9 Exhibit 1, what -- is this entire document in
10 your name -- I mean -- I'm sorry. In your
11 handwriting?

12 A Yes. Yes. This is -- this is my
13 handwriting, yes, but I didn't remember what
14 I -- it's been -- I don't remember if I write
15 this.

16 Q Let's look what's in the upper
17 right-hand corner. It's entertainer. I think
18 it says GO or G 00117?

19 A Is ID number. With this number I
20 used to cash my funny money.

21 Q Okay. We'll talk about the funny
22 money in a second, but you knew this was your ID
23 number?

24 A (Indicating)

25 Q You used that ID number throughout

1 VIKKI

2 A I will take it. We put it in a
3 locker or take it with me at home. After 10
4 o'clock you not cashing anymore.

5 Q So you had to cash them in the next
6 day?

7 A Yes.

8 Q Between 7:30 and 10:00?

9 A Yes.

10 Q Did you ever ask a manager to cash in
11 your diamond dollars at the end of your shift
12 because you were going away on vacation, for
13 example?

14 A I did, and they didn't work.

15 Q Who did you ask?

16 A Who's doing the funny money?

17 Giuseppe, or who's doing the funny money? I
18 forgot the other guy's name.

19 It was other guy's name, Lenny. I
20 don't remember what his name was. He was in the
21 west side. Lenny I think it was.

22 Q So you asked Lenny or someone else?

23 A Yes.

24 A I mean, he will cash me. You know, I
25 will tip him too. He said, you know, the rules,

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2 you know.

3 He would say, "I going on vacation
4 tomorrow. Can you please -- you know, give me
5 check."

6 But I'm not going to be -- you know,
7 like basically like in every six months they put
8 new funny money.

9 And since this money expired, I
10 couldn't cash it anymore. If they want to cash
11 it for me, they will take 50 percent, because
12 the money expired already or not at all. Just
13 keep it.

14 Q So you're saying that if the money
15 was already expired, then you would have to pay
16 more than the ten percent?

17 A Yes.

18 Q But you could still get it?

19 A To me that happens one or twice and,
20 you know, I mean, they did it, you know, even
21 50 percent, but they did it.

22 I said okay. I didn't have a lot.
23 That's why probably did it, or if I had a lot --
24 I mean, some girls they had over 300. They
25 would not do it. They would say no.

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2 Q So you're saying that when your shift
3 ended at 3 o'clock in the morning, so at three
4 you left?

5 A Yes.

6 Q Is that what time you left every day?

7 A No. Sometimes I will leave 4:00,
8 4:30 but 4 o'clock you stop alcohol. And until
9 the club is going to be closed, it's like 4:15,
10 and you had to wait for everybody to get out of
11 the club to, you know, make sure everybody is
12 out, and by the time you get out it's a quarter
13 to five, and I start 6:30. That's how many
14 hours I work.

15 Q Let me see if I understand what you
16 just said.

17 You said that your shift was until
18 3 o'clock?

19 A Yes.

20 Q But you didn't leave at three
21 o'clock?

22 A Because if -- sometimes I would
23 leave, but like many girls, you know, they will
24 leave before. You know, "I'm leaving, I'm
25 leaving, I'm leaving."

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2 receive any employee benefits, such as employee
3 pension plan, employee health plan, vacation
4 pay, sick pay or any other fringe benefit plan
5 that may be offered by Scores to its actual
6 employees." Was that true?

7 A I don't understand that question.

8 Q Well, did you receive any employee
9 benefits while you worked for Scores?

10 A I don't remember.

11 Q Well, for example, when you went on
12 vacation, did you get vacation pay?

13 A No.

14 Q Number C says, "I will pay all my own
15 business expenses that I incur while performed
16 under this independent entertainer agreement."

17 Did you pay your business expenses
18 when you worked for Scores?

19 MS. GREENE: Objection.

20 A I don't understand that question.
21 Clarify the question, please?

22 Q Well, if you purchased dresses, did
23 you -- did you pay for the cost of the dress?

24 A Of course, yes.

25 Q When you took the bus, who paid the

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2 cost of the bus?

3 A I paid.

4 Q When you took a taxi, who paid that

5 cost?

6 A I paid.

7 Q When you purchased makeup, who paid

8 that cost?

9 A I paid.

10 Q Okay. And all of the outfits that

11 you wear there, who paid for those?

12 A I mean, I paid.

13 Q Okay. And did you ever have any

14 surgery for -- so that you would look better in

15 the club?

16 A No.

17 Q Did some of the girls that you know

18 ever have surgery?

19 A Yes.

20 Q Who paid for that surgery?

21 A They pay.

22 Q Let's turn the page to D. "I am

23 responsible for the payment of my own income

24 taxes." Let's just stop there. Was that true?

25 A What you mean? I pay all -- I don't

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2 understand that.

3 Q Well, did you pay your own -- did you
4 pay taxes from the money that you received from
5 Scores when you cashed in your diamond dollars?

6 A I paid Form 1099. Yes, I did. End
7 of year I had to pay. I mean, I had to do other
8 taxes.

9 Q Did you do your own taxes?

10 A They send me form, the 1099 form.
11 They mail it to me, and I had to do taxes like
12 everybody did.

13 Q And you paid Social Security taxes
14 and Medicare taxes?

15 A Yes. Social Security, income. Yes.
16 I paid it.

17 Q You paid it yourself?

18 A I believe yes. I don't remember.
19 Yes. I don't remember.

20 Q Now, E says "I will provide all
21 dresses and other supplies required by me to
22 carry out my work as an entertainer at Scores."
23 Do you understand that one?

24 A I'm not -- can you clarify that
25 question, please?

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2 form or a copy of your tax form that you filed
3 for this year, 2005?

4 A Yes.

5 Q Did you turn it over to your
6 attorney?

7 A I don't remember. I don't remember.
8 Could be yes, could be no. I don't remember.

9 Q Now, if we look at the next pages on
10 this form, we see diamond dollar payout.

11 The first one is for \$306. Do you
12 see that?

13 And then the next one is for \$612.
14 And the next one is for \$630.

15 Do you see those diamond dollars
16 payouts?

17 A What you mean, payout?

18 Q Well, that you got -- you turned in
19 diamond dollars and you got a check for that
20 amount.

21 MS. GREENE: Objection.

22 Q Do you see that on this form?

23 A Yes, I do.

24 Q Do you have any reason to believe
25 that the numbers on this form are not accurate?

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2 A I really don't know, because I don't
3 remember. It's two years ago.

4 Q All right. When you turned in your
5 diamond dollars to get your money back, you
6 received all of that cash back, right?

7 You received all of the amount that
8 you turned in back to you?

9 MS. GREENE: Objection.

10 Q In a check form.

11 A Yes. Check form.

12 Q But you had already paid the fees for
13 the house fee and the DJ fee and the makeup
14 artist fee.

15 You had already paid -- paid those
16 other fees before you turned in your diamond
17 dollars, right?

18 MS. GREENE: Objection.

19 A Not really. Maybe I had to pay
20 later.

21 Q You mean maybe you had to pay later
22 after you got the check?

23 A Yes. Because funny money -- you cash
24 funny money 7:30 -- between 7:30 and 10:00.

25 Maybe I had -- was paying the house fee end of

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2 the night.

3 Q When you paid the house fee at the
4 end of the night, aren't you paying it in
5 diamond dollars?

6 A If I don't have cashed in diamond
7 dollars, I will pay cash in my own money I took
8 with me when I came to work.

9 Q Right, but if you are at the end of
10 the evening and you have diamond dollars, aren't
11 you going to pay your fees with diamond dollars?

12 MS. GREENE: Objection.

13 A I'm explaining, if I didn't have
14 diamond dollars because I cashed my diamond
15 dollars, I will pay cash.

16 Q I see. So you might have already
17 cashed in your diamond dollars?

18 A Yes.

19 Q Earlier in the evening?

20 A Yes. I don't have any more, and I
21 didn't got any more.

22 Q But if you're working until three in
23 the morning, wouldn't you receive any more
24 dollars?

25 A Maybe I don't make money. Maybe.

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2 Q Maybe you won't make any money at
3 all?

4 A Maybe I make a hundred. I have to
5 pay 400 to house or 350 to house.

6 Q Was the house fee you had to pay the
7 same if you paid in a U.S. currency versus
8 diamond dollars?

9 A It was \$180 diamond dollars and 160
10 cash.

11 Q It was a \$180 diamond dollars versus
12 160 cash?

13 A Yes.

14 Q And that's what it was throughout
15 your employment?

16 A Yes.

17 Q The whole time you worked for Scores?

18 A (Indicating)

19 Q Now, if you look at the bottom of
20 Page 3 of this cash disbursements journal, do
21 you see that?

22 A Yes.

23 Q It says a diamond dollar pay-in of
24 \$1,170?

25 A Yes.

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2 know. I can't say yes. I can't say. I don't
3 know.

4 MR. CAPOBIANCO: I'd like to
5 have this marked as Vikki Exhibit 12.

6 (Vikki Exhibit 12, documents,
7 was marked for identification, as of
8 this date.)

9 Q Ms. Vikki, can we put this aside for
10 a second, this Exhibit 12?

11 I want to just go back to Exhibit 11
12 for a second.

13 A Sure.

14 Q Do you know who prepared this
15 document?

16 A No.

17 Q Now, before you signed it, did you
18 see a copy of this document?

19 A No.

20 Q Do you know where you signed this
21 document?

22 A Where I signed this? I signed this
23 in the dressing room, and I went out.

24 Q You signed it in the dressing room?

25 A Yes.

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2 Q So did you decide what would be put
3 into this document?

4 A What you mean by that?

5 Q Did you decide what would be written
6 here?

7 A I didn't even read that. That was --
8 you had to sign, and I just signed it.

9 Q Do you know if anyone else in the
10 club had to pay house fees besides you?

11 A About what?

12 Q Excuse me?

13 A What you mean by that?

14 Q Do you know if anybody else who
15 worked at Scores East or Scores West had to pay
16 house fees?

17 A House fees. House fees the club
18 have?

19 Q Yes.

20 A Everybody has to pay house fee.

21 Q Who is everybody?

22 A I know dancers. I don't know -- or
23 entertainers. I don't know anybody, you know.

24 Q You knew the dancers or the
25 entertainers had to pay the house fee, but you

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2 don't know about anybody else, right?

3 A I don't know. I can't -- I don't
4 know. I don't remember.

5 Q Now, was the house fee ever deducted
6 from your check?

7 A Yes.

8 Q It was deducted from your check how?

9 A When I was going to cash funny money,
10 if I didn't pay my house fee yet, they would --
11 if I had \$500 funny money, they take 180 off and
12 the rest give me a check.

13 Like I have \$500. I'm going to cash
14 it out. The guy who cash the funny money, he's
15 going to take 180 house fee, and rest is going
16 to give me check for.

17 Q Did you ever have that happen to you?

18 A Yes.

19 Q How many times?

20 A The last -- I don't remember, but the
21 last like eight months before I quit, before I
22 left the club, that's how they did it, you know.

23 So that's when cash the funny money.

24 If you cash the funny money, you had to pay

25 house fee, and the rest yes.